



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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ALAMEDA POINT
SSIC NO. 5090.3.A

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OCT 16 2008

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Dot Lofstrom
Project Manager, Northern California Operations
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Dear Ms. Lofstrom:

Subj: IDENTIFICATION OF STATE "APPLICABLE" OR "RELEVANT AND APPROPRIATE" REQUIREMENTS (ARARS) FOR THE REMEDIAL INVESTIGATION AND FEASIBILITY STUDY (RI/FS) AT OU-2C AT NAVAL AIR STATION, ALAMEDA, CALIFORNIA

Pursuant to our previous discussions and Section 10.6 of the Federal Facility Agreement for remedial actions for Naval Air Station (NAS) Alameda, we are hereby requesting that the Department of Toxic Substances Control (DTSC) as the lead agency for the State of California, identify potential state chemical-specific, location-specific, and action-specific ARARS for OU-2C Sites 5, 10 and 12. ARARs identified by the State will be considered and evaluated during the preparation of a feasibility study for the site.

In our Final Remedial Investigation Report for OU-2C, September 18, 2008, we transmitted to you final site characterization data for OU-2C Sites 5, 10, and 12. The site characterization data should allow you to identify State chemical-specific and location-specific ARARs. In addition, please identify State action-specific ARARs for the following preliminary remedial alternatives.

For Soil, one or more of the following:

- Institutional Controls
- Excavation and Offsite Disposal
- Soil Cover or Cap
- Soil Vapor Extraction

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For Groundwater, one or more of the following:

- Institutional Controls
- Monitored Natural Attenuation
- In-situ Thermal Treatment (e.g., Six-phase Heating)
- Accelerated In-situ Bioremediation
- Permeable Reactive Barrier
- In-situ Chemical Oxidation/In-situ Chemical Reduction (ISCO/ISCR)

The State of California may also identify any other criteria, advisories, guidance, and proposed standards that the State requests be considered (TBCs) for the above-identified OU-2C, which has entered the FS phase.

Timely identification of potential State ARARs is required under Section 121(d)(2)(A) of CERCLA and under the National Contingency Plan (NCP), 40 CFR §§300.400(g) and 300.515(d) & (h). Experience to date around the country has shown that a failure to identify ARARs with sufficient precision, early in the RI/FS process, can cause severe disruptions in timely implementation of remedial action. To ensure timely and complete ARARs identification for OU-2C, please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular OU (or IR Site).
3. A description of how the potential State ARAR would apply to potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.
4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.
5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

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Consistent with 40 CFR §300.515(h)(2), we are requesting that you send a response via first class mail addressed to me and postmarked within 30 calendar days of receipt of this request. Please direct any technical questions that you may have concerning this request to Ms. Mary Parker at (619) 532-0945 or me at (619) 532-0907 and any legal questions to Mr. Marvin Norman, Associate Counsel, NAVFAC SW at (415) 743-472.

Sincerely,



GEORGE P. BROOKS
BRAC Environmental Coordinator
By direction of the Director

Copy to:
Ms Anna-Marie Cook
U. S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. John West
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612